Filed: 7/28/2020 10:32 AM
Lynne Finley
District Clerk
Collin County, Texas
By Tatiana Ortega Deputy
Envelope ID: 44878231

NO. 417-53803-2020

EX PARTE	§	**IN THE DISTRICT COURT**
	§	
S.L, J.L. AND L.L.,	§	**417th JUDICIAL DISTRICT**
	§	
CHILDREN	§	**COLLIN COUNTY, TEXAS**

PETITION FOR WRIT OF HABEAS CORPUS

1. Discovery in this case is intended to be conducted under level 2 of rule 190 of the Texas Rules of Civil Procedure.

2. This Petition for Writ of Habeas Corpus is brought by Kelly Long, Petitioner, who resides at 10412 Max Lane, Frisco, Texas 75035. The last three numbers of Kelly Long's driver's license number are 759. The last three numbers of Kelly Long's Social Security number are 991.

3. Petitioner is presently entitled to the possession of the children Sophie Long, Jack Long and Lucas Long by virtue of an order entered by the 433rd District Court of Comal County, Texas, in Cause No. C2015-0238D. This order is in full force and effect. A certified copy of the order is attached to this petition as Exhibit "A". This case has been transferred to Collin County, Texas.

4. The children are illegally restrained by Michael Long, Respondent, at 181 High Point Road, Seguin, Guadalupe County, Texas. Please see Petitioner's affidavit attached hereto as Exhibit B and incorporated for all intents and purpose. Process should be served on Respondent at that address.

5. It was necessary to secure the services of Amber Shemesh and the Law Offices of Amber Shemesh, a licensed attorney, to preserve and protect the rights of the children. Respondent should be ordered to pay reasonable attorney's fees, expenses, and costs, and a judgment should be rendered in favor of this attorney and against Respondent and be ordered paid directly to Petitioner's

attorney, who may enforce the judgment in the attorney's own name. Petitioner requests postjudgment interest as allowed by law.

6. Petitioner prays that the Court immediately issue its writ of habeas corpus commanding that the children be brought immediately before this Court and that the children be returned to Petitioner.

Petitioner further requests that Respondent be ordered to pay all costs of court.

Petitioner prays for recovery of all relief requested and for all general relief to which this Court may deem Petitioner entitled.

Respectfully submitted,

Law Offices of Amber Shemesh, P.C.
12222 Merit Drive, Suite 1200
DALLAS, TX 75251
Tel: (214) 432-2501
Fax: (214) 432-2510

By: _____
Amber Shemesh
State Bar No. 24075066
amber@shemeshfamilylaw.com
Alexandra Willen
State Bar No. 24110533
awillen@shemeshfamilylaw.com
Attorneys for Petitioner

Certificate of Conference

I certify that a reasonable effort has been made to resolve dispute without the necessity of court intervention and has failed. Please see the emails to opposing counsel attached hereto as Exhibit C and incorporated for all intents and purposes.

_____
Amber Shemesh/ Alexandra Willen
Attorneys for Kelly Long

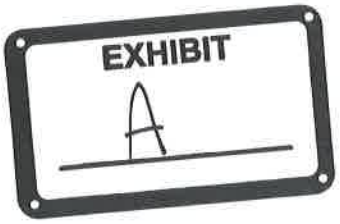
The undersigned states under oath: "I am the Petitioner in the foregoing Petition for Writ of Habeas Corpus. I have personal knowledge of the allegations and facts stated in it, and they are true and correct."

Affiant

SIGNED under oath before me on July 28, 2020.

Notary Public, State of Texas

ADRIANA CANCINO
Notary Public, State of Texas
Comm. Expires 05-31-2022
Notary ID 129228325



FILED
C2015-0238D
7/2/2020 2:23 PM
Heather N. Kellar
Comal County
District Clerk
Accepted By:
Sarah Abrego

FILED FOR RECORD
At 4:15 'clock P M
JULY 9, 2020
HEATHER N. KELLAR
CLERK DISTRICT COURT
COMAL COUNTY, TEXAS
BY TET DEPUTY

NOTICE: THIS DOCUMENT CONTAINS SENSITIVE DATA

NO. C2015-0238D

IN THE INTEREST OF	§	**IN THE DISTRICT COURT**
	§	
S.L., J.L. AND L.L.	§	**433RD JUDICIAL DISTRICT**
	§	
CHILDREN	§	**COMAL COUNTY, TEXAS**

ORDER IN SUIT AFFECTING THE PARENT-CHILD RELATIONSHIP

On 7/7/2020 the Court heard this case.

Appearances

Petitioner, MICHAEL LONG, appeared in person and through attorney of record, Tracie Wright-Reneau, and announced ready for trial.

Respondent, KELLY LONG, has made a general appearance and has agreed to the terms of this order to the extent permitted by law, as evidenced by Respondent's signature below.

Jurisdiction

The Court, after examining the record and the evidence and argument of counsel, finds that it has jurisdiction of this case and of all the parties and that no other court has continuing, exclusive jurisdiction of this case. All persons entitled to citation were properly cited.

Jury

A jury was waived, and all questions of fact and of law were submitted to the Court.

Record

The making of a record of testimony was waived by the parties with the consent of the Court.

Children

The Court finds that the following children are the subject of this suit:

Name: S.L.
Sex: Female
Birth date: 09/16/2010
Home state: Texas

Name: J.L.
Sex: Male
Birth date: 11/11/2012

7/2/2020 2:36 PM

FWD DCT NS

Home state: Texas

Name: L.L.
Sex: Male
Birth date: 12/19/2013
Home state: Texas

Parenting Plan

The Court finds that the provisions in these orders relating to the rights and duties of the parties with relation to the children, possession of and access to the children, child support, and optimizing the development of a close and continuing relationship between each party and the children constitute the parties' agreed parenting plan.

Conservatorship

The Court finds that the following orders are in the best interest of the children.

IT IS ORDERED that MICHAEL LONG and KELLY LONG are appointed Joint Managing Conservators of the following children: S.L., J.L. and L.L.

IT IS ORDERED that, at all times, MICHAEL LONG and KELLY LONG, as a parent joint managing conservators, shall have the following rights:

1. the right to receive information from any other conservator of the children concerning the health, education, and welfare of the children;

2. the right to confer with the other parent to the extent possible before making a decision concerning the health, education, and welfare of the children;

3. the right of access to medical, dental, psychological, and educational records of the children;

4. the right to consult with a physician, dentist, or psychologist of the children;

5. the right to consult with school officials concerning the children's welfare and educational status, including school activities;

6. the right to attend school activities;

7. the right to be designated on the children's records as a person to be notified in case of an emergency;

8. the right to consent to medical, dental, and surgical treatment during an emergency involving an immediate danger to the health and safety of the children; and

9. the right to manage the estates of the children to the extent the estates have been

created by the parent or the parent's family.

IT IS ORDERED that, at all times, MICHAEL LONG and KELLY LONG, as parent joint managing conservators, shall each have the following duties:

1. the duty to inform the other conservator of the children in a timely manner of significant information concerning the health, education, and welfare of the children;

2. the duty to inform the other conservator of the children if the conservator resides with for at least thirty days, marries, or intends to marry a person who the conservator knows is registered as a sex offender under chapter 62 of the Texas Code of Criminal Procedure or is currently charged with an offense for which on conviction the person would be required to register under that chapter. IT IS ORDERED that notice of this information shall be provided to the other conservator of the children as soon as practicable, but not later than the fortieth day after the date the conservator of the children begins to reside with the person or on the tenth day after the date the marriage occurs, as appropriate. IT IS ORDERED that the notice must include a description of the offense that is the basis of the person's requirement to register as a sex offender or of the offense with which the person is charged. WARNING: A CONSERVATOR COMMITS AN OFFENSE PUNISHABLE AS A CLASS C MISDEMEANOR IF THE CONSERVATOR FAILS TO PROVIDE THIS NOTICE;

3. the duty to inform the other conservator of the children if the conservator establishes a residence with a person who the conservator knows is the subject of a final protective order sought by an individual other than the conservator that is in effect on the date the residence with the person is established. IT IS ORDERED that notice of this information shall be provided to the other conservator of the children as soon as practicable, but not later than the thirtieth day after the date the conservator establishes residence with the person who is the subject of the final protective order. WARNING: A CONSERVATOR COMMITS AN OFFENSE PUNISHABLE AS A CLASS C MISDEMEANOR IF THE CONSERVATOR FAILS TO PROVIDE THIS NOTICE;

4. the duty to inform the other conservator of the children if the conservator resides with, or allows unsupervised access to a child by, a person who is the subject of a final protective order sought by the conservator after the expiration of sixty-day period following the date the final protective order is issued. IT IS ORDERED that notice of this information shall be provided to the other conservator of the children as soon as practicable, but not later than the ninetieth day after the date the final protective order was issued. WARNING: A CONSERVATOR COMMITS AN OFFENSE PUNISHABLE AS A CLASS C MISDEMEANOR IF THE CONSERVATOR FAILS TO PROVIDE THIS NOTICE; and

5. the duty to inform the other conservator of the children if the conservator is the subject of a final protective order issued after the date of the order establishing conservatorship. IT IS ORDERED that notice of this information shall be provided to the other conservator of the children as soon as practicable, but not later than the thirtieth day after the date the final protective order was issued. WARNING: A CONSERVATOR COMMITS AN OFFENSE PUNISHABLE AS A CLASS C MISDEMEANOR IF THE CONSERVATOR FAILS TO

PROVIDE THIS NOTICE.

IT IS ORDERED that, during his periods of possession, MICHAEL LONG and KELLY LONG, as parent joint managing conservatosr, shall have the following rights and duties:

1. the duty of care, control, protection, and reasonable discipline of the children;

2. the duty to support the children, including providing the children with clothing, food, shelter, and medical and dental care not involving an invasive procedure;

3. the right to consent for the children to medical and dental care not involving an invasive procedure; and

4. the right to direct the moral and religious training of the children.

IT IS ORDERED that MICHAEL LONG, as a parent joint managing conservator, shall have the following rights and duty:

1. the independent right to consent to medical, dental, and surgical treatment involving invasive procedures;

2. the independent right to consent to psychiatric and psychological treatment of the children;

3. the independent right to represent the children in legal action and to make other decisions of substantial legal significance concerning the children;

4. the independent right to consent to marriage and to enlistment in the armed forces of the United States;

5. the independent right to make decisions concerning the children's education;

6. except as provided by section 264.0111 of the Texas Family Code, the independent right to the services and earnings of the children;

7. except when a guardian of the children's estates or a guardian or attorney ad litem has been appointed for the children, the independent right to act as an agent of the children in relation to the children's estates if the children's action is required by a state, the United States, or a foreign government; and

8. the independent duty to manage the estates of the children to the extent the estates have been created by community property or the joint property of the parent.

IT IS ORDERED that KELLY LONG, as a parent joint managing conservator, shall have the following rights and duty:

1. the exclusive right to designate the primary residence of the children within Collin, Denton, or Bexar Counties or any county between them in the I-35 corridor.

2. the independent right to consent to medical, dental, and surgical treatment involving invasive procedures;

3. the independent right to consent to psychiatric and psychological treatment of the children;

4. the exclusive right to receive and give receipt for periodic payments for the support of the children and to hold or disburse these funds for the benefit of the children;

5. the independent right to represent the children in legal action and to make other decisions of substantial legal significance concerning the children;

6. the independent right to consent to marriage and to enlistment in the armed forces of the United States;

7. the independent right to make decisions concerning the children's education;

8. except as provided by section 264.0111 of the Texas Family Code, the independent right to the services and earnings of the children;

9. except when a guardian of the children's estates or a guardian or attorney ad litem has been appointed for the children, the independent right to act as an agent of the children in relation to the children's estates if the children's action is required by a state, the United States, or a foreign government; and

10. the independent duty to manage the estates of the children to the extent the estates have been created by community property or the joint property of the parents.

Although the parties are appointed joint managing conservators, the parties agree and IT IS ORDERED that if the parties cannot reach an agreement as to the above rights and duties then KELLY LONG shall make the final determination on the disputed matter.

The Court finds that, in accordance with section 153.001 of the Texas Family Code, it is the public policy of Texas to assure that children will have frequent and continuing contact with parents who have shown the ability to act in the best interest of the child, to provide a safe, stable, and nonviolent environment for the child, and to encourage parents to share in the rights and duties of raising their child after the parents have separated or dissolved their marriage. IT IS ORDERED that the primary residence of the children shall be within Collin, Denton, or Bexar Counties or any county between them in the I-35 corridor, and the parties shall not remove the

children from Collin, Denton, or Bexar Counties or any county between them in the I-35 corridor, for the purpose of changing the primary residence of the children until modified by further order of the court of continuing jurisdiction or by written agreement signed by the parties and filed with the court.

Possession and Access

1. Standard Possession Order

IT IS ORDERED that each conservator shall comply with all terms and conditions of this Standard Possession Order. IT IS ORDERED that this Standard Possession Order is effective immediately and applies to all periods of possession occurring on and after the date the Court signs this Standard Possession Order. IT IS, THEREFORE, ORDERED:

(a) Definitions

1. In this Standard Possession Order "school" means the elementary or secondary school in which the child is enrolled or, if the child is not enrolled in an elementary or secondary school, the public school district in which the child primarily resides.

2. In this Standard Possession Order "child" includes each child, whether one or more, who is a subject of this suit while that child is under the age of eighteen years and not otherwise emancipated.

(b) Mutual Agreement or Specified Terms for Possession

IT IS ORDERED that the conservators shall have possession of the child at times mutually agreed to in advance by the parties, and, in the absence of mutual agreement, it is ORDERED that the conservators shall have possession of the child under the specified terms set out in this Standard Possession Order.

(c) Parents Who Reside 100 Miles or Less Apart

Except as otherwise expressly provided in this Standard Possession Order, when MICHAEL LONG resides 100 miles or less from the primary residence of the child, MICHAEL LONG shall have the right to possession of the child as follows:

1. Weekends –

On weekends that occur during the regular school term, beginning at 6:00 p.m., on the first, third, and fifth Friday of each month and ending at 6:00 p.m. on the following Sunday.

On weekends that do not occur during the regular school term, beginning at 6:00 p.m., on the first, third, and fifth Friday of each month and ending at 6:00 p.m. on the following Sunday.

2. Weekend Possession Extended by a Holiday –

Except as otherwise expressly provided in this Standard Possession Order, if a weekend period of possession by MICHAEL LONG begins on a student holiday or a teacher in-service day that falls on a Friday during the regular school term, as determined by the school in which the child is enrolled, or a federal, state, or local holiday that falls on a Friday during the summer months when school is not in session, that weekend period of possession shall begin at 6:00 p.m. on the immediately preceding Thursday.

Except as otherwise expressly provided in this Standard Possession Order, if a weekend period of possession by MICHAEL LONG ends on or is immediately followed by a student holiday or a teacher in-service day that falls on a Monday during the regular school term, as determined by the school in which the child is enrolled, or a federal, state, or local holiday that falls on a Monday during the summer months when school is not in session, that weekend period of possession shall end at 6:00 p.m. on that Monday.

3. Thursdays - On Thursday of each week during the regular school term, beginning at 6:00 p.m. and ending at 8:00 p.m.

4. Spring Vacation in Even-Numbered Years - In even-numbered years, beginning at 6:00 p.m. on the day the child is dismissed from school for the school's spring vacation and ending at 6:00 p.m. on the day before school resumes after that vacation.

5. Extended Summer Possession by MICHAEL LONG –

With Written Notice by April 1 - If MICHAEL LONG gives KELLY LONG written notice by April 1 of a year specifying an extended period or periods of summer possession for that year, MICHAEL LONG shall have possession of the child for thirty days beginning no earlier than the day after the child's school is dismissed for the summer vacation and ending no later than seven days before school resumes at the end of the summer vacation in that year, to be exercised in no more than two separate periods of at least seven consecutive days each, as specified in the written notice, provided that the period or periods of extended summer possession do not interfere with Father's Day possession. These periods of possession shall begin and end at 6:00 p.m. on each applicable day.

Without Written Notice by April 1 - If MICHAEL LONG does not give

KELLY LONG written notice by April 1 of a year specifying an extended period or periods of summer possession for that year, MICHAEL LONG shall have possession of the child for thirty consecutive days in that year beginning at 6:00 p.m. on July 1 and ending at 6:00 p.m. on July 31.

Notwithstanding the Thursday periods of possession during the regular school term and the weekend periods of possession ORDERED for MICHAEL LONG, it is expressly ORDERED that KELLY LONG shall have a superior right of possession of the child as follows:

1. Spring Vacation in Odd-Numbered Years - In odd-numbered years, beginning at 6:00 p.m. on the day the child is dismissed from school for the school's spring vacation and ending at 6:00 p.m. on the day before school resumes after that vacation.

2. Summer Weekend Possession by KELLY LONG - If KELLY LONG gives MICHAEL LONG written notice by April 15 of a year, KELLY LONG shall have possession of the child on any one weekend beginning at 6:00 p.m. on Friday and ending at 6:00 p.m. on the following Sunday during any one period of the extended summer possession by MICHAEL LONG in that year, provided that KELLY LONG picks up the child from MICHAEL LONG and returns the child to that same place.

3. Extended Summer Possession by KELLY LONG - If KELLY LONG gives MICHAEL LONG written notice by April 15 of a year or gives MICHAEL LONG fourteen days' written notice on or after April 16 of a year, KELLY LONG may designate one weekend beginning no earlier than the day after the child's school is dismissed for the summer vacation and ending no later than seven days before school resumes at the end of the summer vacation, during which an otherwise scheduled weekend period of possession by MICHAEL LONG shall not take place in that year, provided that the weekend so designated does not interfere with MICHAEL LONG's period or periods of extended summer possession or Father's Day possession.

(d) Parents Who Reside More Than 100 Miles Apart

Except as otherwise expressly provided in this Standard Possession Order, when MICHAEL LONG resides more than 100 miles from the residence of the child, MICHAEL LONG shall have the right to possession of the child as follows:

1. Weekend Periods of Possession

a. Weekends in 2017 - MICHAEL LONG shall have possession of the children one weekend per month beginning Fridat at 5:00 p.m. and ending Sunday at 5:00 p.m. to be designated by MICHAEL LONG on or before August 18, 2017.

b. Weekends beginning in 2018- MICHAEL LONG shall have possession of the children one weekend per month beginning on Friday at 5:00 p.m. and ending on Sunday at 5:00 p.m. to be designated 14 days before the day school is to begin for that calendar year.

c. Change of School-If any child changes school districts during the school year then MICHAEL LONG may designate new weekends to exercise possession for that school year.

2. Weekend Possession Extended by a Holiday –

Except as otherwise expressly provided in this Standard Possession Order, if a weekend period of possession by MICHAEL LONG begins on a student holiday or a teacher in-service day that falls on a Friday during the regular school term, as determined by the school in which the child is enrolled, or a federal, state, or local holiday during the summer months when school is not in session, that weekend period of possession shall begin at 6:00 p.m. on the immediately preceding Thursday

Except as otherwise expressly provided in this Standard Possession Order, if a weekend period of possession by MICHAEL LONG ends on or is immediately followed by a student holiday or a teacher in-service day that falls on a Monday during the regular school term, as determined by the school in which the child is enrolled, or a federal, state, or local holiday that falls on a Monday during the summer months when school is not in session, that weekend period of possession shall end at 6:00 p.m. on that Monday.

3. Spring Vacation in All Years - Every year, beginning at 6:00 p.m. on the day the child is dismissed from school for the school's spring vacation and ending at 6:00 p.m. on the day before school resumes after that vacation.

4. Extended Summer Possession by MICHAEL LONG –

With Written Notice by April 1 - If MICHAEL LONG gives KELLY LONG written notice by April 1 of a year specifying an extended period or periods of summer possession for that year, MICHAEL LONG shall have possession of the child for forty-two days beginning no earlier than the day after the child's school is dismissed for the summer vacation and ending no later than seven days before school resumes at the end of the summer vacation in that year, to be exercised in no more than two separate periods of at least seven consecutive days each, as specified in the written notice, provided that the period or periods of extended summer possession do not interfere with Father's Day possession. These periods of possession shall begin and end at 6:00 p.m. on each applicable day.

Without Written Notice by April 1 - If MICHAEL LONG does not give KELLY LONG written notice by April 1 of a year specifying an extended period or periods of summer possession for that year, MICHAEL LONG shall have possession of the child for forty-two consecutive days beginning at 6:00 p.m. on June 15 and ending at 6:00 p.m. on July 27 of that year.

Notwithstanding the weekend periods of possession ORDERED for MICHAEL LONG, it is expressly ORDERED that KELLY LONG shall have a superior right of possession of the child as follows:

1. Summer Weekend Possession by KELLY LONG - If KELLY LONG gives MICHAEL LONG written notice by April 15 of a year, KELLY LONG shall have possession of the child on any one weekend beginning at 6:00 p.m. on Friday and ending at 6:00 p.m. on the following Sunday during any one period of possession by MICHAEL LONG during MICHAEL LONG's extended summer possession in that year, provided that if a period of possession by MICHAEL LONG in that year exceeds thirty days, KELLY LONG may have possession of the child under the terms of this provision on any two nonconsecutive weekends during that period and provided that KELLY LONG picks up the child from MICHAEL LONG and returns the child to that same place.

2. Extended Summer Possession by KELLY LONG - If KELLY LONG gives MICHAEL LONG written notice by April 15 of a year, KELLY LONG may designate twenty-one days beginning no earlier than the day after the child's school is dismissed for the summer vacation and ending no later than seven days before school resumes at the end of the summer vacation in that year, to be exercised in no more than two separate periods of at least seven consecutive days each, during which MICHAEL LONG shall not have possession of the child, provided that the period or periods so designated do not interfere with MICHAEL LONG's period or periods of extended summer possession or Father's Day possession. These periods of possession shall begin and end at 6:00 p.m. on each applicable day.

(e) Holidays Unaffected by Distance

Notwithstanding the weekend and Thursday periods of possession of MICHAEL LONG, KELLY LONG and MICHAEL LONG shall have the right to possession of the child as follows:

1. Christmas Holidays in Even-Numbered Years - In even-numbered years, MICHAEL LONG shall have the right to possession of the child beginning at 6:00 p.m. on the day the child is dismissed from school for the Christmas school vacation and ending at noon on December 28, and KELLY LONG shall have the right to possession of the child beginning at noon on December 28 and

ending at 6:00 p.m. on the day before school resumes after that Christmas school vacation.

2. Christmas Holidays in Odd-Numbered Years - In odd-numbered years, KELLY LONG shall have the right to possession of the child beginning at 6:00 p.m. on the day the child is dismissed from school for the Christmas school vacation and ending at noon on December 28, and MICHAEL LONG shall have the right to possession of the child beginning at noon on December 28 and ending at 6:00 p.m. on the day before school resumes after that Christmas school vacation.

3. Thanksgiving in Odd-Numbered Years - In odd-numbered years, MICHAEL LONG shall have the right to possession of the child beginning at 6:00 p.m. on the day the child is dismissed from school for the Thanksgiving holiday and ending at 6:00 p.m. on the Sunday following Thanksgiving.

4. Thanksgiving in Even-Numbered Years - In even-numbered years, KELLY LONG shall have the right to possession of the child beginning at 6:00 p.m. on the day the child is dismissed from school for the Thanksgiving holiday and ending at 6:00 p.m. on the Sunday following Thanksgiving.

5. Child's Birthday - If a parent is not otherwise entitled under this Standard Possession Order to present possession of a child on the child's birthday, that parent shall have possession of the child and the child's minor siblings beginning at 6:00 p.m. and ending at 8:00 p.m. on that day, provided that that parent picks up the children from the other parent's residence and returns the children to that same place.

6. Father's Day - MICHAEL LONG shall have the right to possession of the child each year, beginning at 6:00 p.m. on the Friday preceding Father's Day and ending at 6:00 p.m. on Father's Day, provided that if MICHAEL LONG is not otherwise entitled under this Standard Possession Order to present possession of the child, he shall pick up the child from KELLY LONG's residence and return the child to that same place.

7. Mother's Day - KELLY LONG shall have the right to possession of the child each year, beginning at 6:00 p.m. on the Friday preceding Mother's Day and ending at 6:00 p.m. on Mother's Day, provided that if KELLY LONG is not otherwise entitled under this Standard Possession Order to present possession of the child, she shall pick up the child from MICHAEL LONG's residence and return the child to that same place.

(f) Undesignated Periods of Possession

KELLY LONG shall have the right of possession of the child at all other times not specifically designated in this Standard Possession Order for MICHAEL

LONG.

(g) General Terms and Conditions

Except as otherwise expressly provided in this Standard Possession Order, the terms and conditions of possession of the child that apply regardless of the distance between the residence of a parent and the child are as follows:

1. Surrender of Child by KELLY LONG - KELLY LONG is ORDERED to surrender the child to MICHAEL LONG at the beginning of each period of MICHAEL LONG's possession at 4273 N Interstate Hwy 35, Waco, TX 76705.

2. Surrender of Child MICHAEL LONG - MICHALE LONG is ORDERED to surrender the child to KELLY LONG at the Starbucks located at 4273 N Interstate Hwy 35, Waco, TX 76705at the end of each period of possession.

3. Surrender of Child by MICHAEL LONG - MICHAEL LONG is ORDERED to surrender the child to KELLY LONG, if the child is in MICHAEL LONG's possession or subject to MICHAEL LONG's control, at the beginning of each period of KELLY LONG's exclusive periods of possession, at the place designated in this Standard Possession Order.

4. Return of Child by KELLY LONG - KELLY LONG is ORDERED to return the child to MICHAEL LONG, if MICHAEL LONG is entitled to possession of the child, at the end of each of KELLY LONG's exclusive periods of possession, at the place designated in this Standard Possession Order.

5. Personal Effects - Each conservator is ORDERED to return with the child the personal effects that the child brought at the beginning of the period of possession.

6. Designation of Competent Adult - Each conservator may designate any competent adult to pick up and return the child, as applicable. IT IS ORDERED that a conservator or a designated competent adult be present when the child is picked up or returned.

7. Inability to Exercise Possession - Each conservator is ORDERED to give notice to the person in possession of the child on each occasion that the conservator will be unable to exercise that conservator's right of possession for any specified period.

8. Written Notice - Written notice, including notice provided by electronic mail or facsimile, shall be deemed to have been timely made if received

or, if applicable, postmarked before or at the time that notice is due. Each conservator is ORDERED to notify the other conservator of any change in the conservator's electronic mail address or facsimile number within twenty-four hours after the change.

This concludes the Standard Possession Order.

2. Duration

The periods of possession ordered above apply to each child the subject of this suit while that child is under the age of eighteen years and not otherwise emancipated.

3. Electronic Communication

For purposes of this order, the term "electronic communication" means any communication facilitated by the use of any wired or wireless technology via the Internet or any other electronic media. The term includes communication facilitated by the use of a telephone, electronic mail, instant messaging, videoconferencing, or webcam.

IT IS ORDERED that the conservators shall have electronic communication with the children to supplement their periods of possession as follows:

a. Weekend Communication- The parent who is with the child shall make the child available by Facetime or telephone on each Saturday at 7:00 p.m. so that the other parent may talk to the child. Time of the communication shall be limited to 30 minutes.

b. Weekday Communication during extended visitation- The Parent who is in possession of the child shall make the child available by Facetime or telephone on each Monday, Wednesday, and Friday at 7:00 p.m. so that the other parent may talk to the child. Time of the communication shall be limited to 30 minutes.

c. If a message is left from the parent who is not with the children, the other parent shall assist the children in returning the call within 24 hours.

IT IS ORDERED that each conservator shall -

a. provide the other conservator with the e-mail addresses and other electronic communication access information of the children within 3 days after the Court signs this order;

b. notify the other conservator of any change in the e-mail addresses or other

electronic communication access information not later than twenty-four hours after the date the change takes effect; and

c. if necessary equipment is reasonably available, accommodate electronic communication with the child with the same privacy, respect, and dignity accorded all other forms of access, at a reasonable time and for a reasonable duration subject to any limitation provided in this order.

4. Noninterference with Possession

Except as expressly provided herein, IT IS ORDERED that neither conservator shall take possession of the children during the other conservator's period of possession unless there is a prior written agreement signed by both conservators or in case of an emergency.

5. Termination of Orders

The provisions of this order relating to conservatorship, possession, or access terminate on the remarriage of MICHAEL LONG to KELLY LONG unless a nonparent or agency has been appointed conservator of the children under chapter 153 of the Texas Family Code.

Child Support

IT IS ORDERED that MICHAEL LONG is obligated to pay and shall pay to KELLY LONG child support of four hundred thirty-eight dollars and sixty-one cents ($438.61) per month, with the first payment being due and payable on September 1, 2017 and a like payment being due and payable on the 1st day of each month thereafter until the first month following the date of the earliest occurrence of one of the events specified below:

1. any child reaches the age of eighteen years or graduates from high school, whichever occurs later, subject to the provisions for support beyond the age of eighteen years set out below;

2. any child marries;

3. any child dies;

4. any child enlists in the armed forces of the United States and begins active service as defined by section 101 of title 10 of the United States Code; or

5. any child's disabilities are otherwise removed for general purposes.

Thereafter, MICHAEL LONG is ORDERED to pay to KELLY LONG child support of

three hundred sixty five dollars and seventy two cents ($365.72) per month, due and payable on the 1st day of the first month immediately following the date of the earliest occurrence of one of the events specified above for another child and a like sum due and payable on the 1st day of each month thereafter until the next occurrence of one of the events specified above for another child.

Thereafter, MICHAEL LONG is ORDERED to pay to KELLY LONG child support of two hundred ninety two dollars and fifty seven cents ($292.57) per month, due and payable on the 1st day of the first month immediately following the date of the earliest occurrence of one of the events specified above for another child and a like sum due and payable on the 1st day of each month thereafter until the next occurrence of one of the events specified above for another child.

If the child is eighteen years of age and has not graduated from high school, IT IS ORDERED that MICHAEL LONG's obligation to pay child support to KELLY LONG shall not terminate but shall continue for as long as the child is enrolled-

1. under chapter 25 of the Texas Education Code in an accredited secondary school in a program leading toward a high school diploma or under section 130.008 of the Education Code in courses for joint high school and junior college credit and is complying with the minimum attendance requirements of subchapter C of chapter 25 of the Education Code or

2. on a full-time basis in a private secondary school in a program leading toward a high school diploma and is complying with the minimum attendance requirements imposed by that school.

Withholding from Earnings

IT IS ORDERED that any employer of MICHAEL LONG shall be ordered to withhold the child support payments ordered in this order from the disposable earnings of MICHAEL LONG for the support of S.L., J.L. and L.L.

IT IS FURTHER ORDERED that all amounts withheld from the disposable earnings of MICHAEL LONG by the employer and paid in accordance with the order to that employer shall constitute a credit against the child support obligation. Payment of the full amount of child support ordered paid by this order through the means of withholding from earnings shall discharge the child support obligation. If the amount withheld from earnings and credited against the child support obligation is less than 100 percent of the amount ordered to be paid by

this order, the balance due remains an obligation of MICHAEL LONG, and it is hereby ORDERED that MICHAEL LONG pay the balance due directly to the state disbursement unit specified below.

On this date the Court authorized the issuance of an Income Withholding for Support.

Payment

IT IS ORDERED that all payments shall be made through the state disbursement unit at Texas Child Support Disbursement Unit, P.O. Box 659791, San Antonio, Texas 78265-9791, and thereafter promptly remitted to KELLY LONG for the support of the children.

IT IS ORDERED that each party shall pay, when due, all fees charged to that party by the state disbursement unit and any other agency statutorily authorized to charge a fee.

Change of Employment

IT IS FURTHER ORDERED that MICHAEL LONG shall notify this Court and KELLY LONG by U.S. certified mail, return receipt requested, of any change of address and of any termination of employment. This notice shall be given no later than seven days after the change of address or the termination of employment. This notice or a subsequent notice shall also provide the current address of MICHAEL LONG and the name and address of his current employer, whenever that information becomes available.

Clerk's Duties

IT IS ORDERED that, on the request of a prosecuting attorney, the title IV-D agency, the friend of the Court, a domestic relations office, KELLY LONG, MICHAEL LONG, or an attorney representing KELLY LONG or MICHAEL LONG, the clerk of this Court shall cause a certified copy of the Income Withholding for Support to be delivered to any employer.

Suspension of Withholding from Earnings

The Court finds that good cause exists that no order to withhold from earnings for child support should be delivered to any employer of MICHAEL LONG as long as no delinquency or other violation of this child support order occurs and as long as the Office of the Attorney General Child Support Division is not providing services to KELLY LONG. For the purpose of this provision, a delinquency has occurred if MICHAEL LONG has been in arrears for an amount due for more than thirty days or the amount of the arrearages equals or is greater than the amount due for a one-month period. If a delinquency or other violation occurs or if the Office of the Attorney General Child Support Division begins providing services to KELLY LONG, the

clerk shall deliver the order to withhold earnings as provided above.

Accordingly, IT IS ORDERED that, as long as no delinquency or other violation of this child support order occurs and as long as the Office of the Attorney General Child Support Division is not providing services to KELLY LONG, all payments shall be made through the state disbursement unit and thereafter promptly remitted to KELLY LONG for the support of the children. If a delinquency or other violation occurs or if the Office of the Attorney General Child Support Division begins providing services to KELLY LONG, all payments shall be made in accordance with the order to withhold earnings as provided above.

Health Care

1. IT IS ORDERED that MICHAEL LONG and KELLY LONG shall each provide medical support for the child as set out in this order as additional child support for as long as the Court may order MICHAEL LONG and KELLY LONG to provide support for the child under sections 154.001 and 154.002 of the Texas Family Code. Beginning on the day MICHAEL LONG and KELLY LONG's actual or potential obligation to support the child under sections 154.001 and 154.002 of the Family Code terminates, IT IS ORDERED that MICHAEL LONG and KELLY LONG are discharged from the obligations set forth in this medical support order, except for any failure by a parent to fully comply with those obligations before that date.

2. Definitions -

"Health Insurance" means insurance coverage that provides basic health-care services, including usual physician services, office visits, hospitalization, and laboratory, X-ray, and emergency services, that may be provided through a health maintenance organization or other private or public organization, other than medical assistance under chapter 32 of the Texas Human Resources Code.

"Reasonable cost" means the cost of health insurance coverage for a child that does not exceed 9 percent of MICHAEL LONG's annual resources, as described by section 154.062(b) of the Texas Family Code.

"Reasonable and necessary health-care expenses not paid by insurance and incurred by or on behalf of a child" include, without limitation, any copayments for office visits or prescription drugs, the yearly deductible, if any, and medical, surgical, prescription drug, mental health-care services, dental, eye care, ophthalmological, and orthodontic charges. These reasonable and

necessary health-care expenses do not include expenses for travel to and from the health-care provider or for nonprescription medication.

"Furnish" means -

a. to hand deliver the document by a person eighteen years of age or older either to the recipient or to a person who is eighteen years of age or older and permanently resides with the recipient;

b. to deliver the document to the recipient by certified mail, return receipt requested, to the recipient's last known mailing or residence address;

c. to deliver the document to the recipient at the recipient's last known mailing or residence address using any person or entity whose principal business is that of a courier or deliverer of papers or documents either within or outside the United States; or

3. Findings on Health Insurance Availability- Having considered the cost, accessibility, and quality of health insurance coverage available to the parties, the Court finds:

Health insurance is available or is in effect for the child through KELLY LONG's employment or membership in a union, trade association, or other organization.

MICHAEL LONG is ORDERED to pay KELLY LONG reasonable cash medical support, as additional child support, in an amount equal to 9% of his annual resources which is one hundred and sixt dollars and 00/100 ($160.00) per month, with the first installment being due and payable on September 1, 2017, and a like installment being due and payable on or before the 1st day of each month until the termination or modification of current child support for the child under this order.

IT IS FURTHER FOUND that the following orders regarding health-care coverage are in the best interest of the child.

4. Provision of Health-Care Coverage -

As child support, KELLY LONG is ORDERED to continue to maintain health insurance for the child who is the subject of this suit that covers basic health-care services, including usual physician services, office visits, hospitalization, laboratory, X-ray, and emergency services.

KELLY LONG is ORDERED to maintain such health insurance in full force and effect on the child who is the subject of this suit as long as child support is payable for that child.

KELLY LONG is ORDERED to convert any group insurance to individual coverage or obtain other health insurance for the child within fifteen days of termination of his employment or other disqualification from the group insurance. KELLY LONG is ORDERED to exercise any conversion options or acquisition of new health insurance in such a manner that the resulting insurance equals or exceeds that in effect immediately before the change.

KELLY LONG is ORDERED to furnish MCIHAEL LONG a true and correct copy of the health insurance policy or certification and a schedule of benefits within 10 days of the signing of this order. KELLY LONG is ORDERED to furnish MICHAEL LONG the insurance cards and any other forms necessary for use of the insurance within 10 days of the signing of this order. KELLY LONG is ORDERED to provide, within three days of receipt by him, to MICHAEL LONG any insurance checks, other payments, or explanations of benefits relating to any medical expenses for the child that MICHAEL LONG paid or incurred.

Pursuant to section 1504.051 of the Texas Insurance Code, IT IS ORDERED that if KELLY LONG is eligible for dependent health coverage but fails to apply to obtain coverage for the child, the insurer shall enroll the child on application of MICHAEL LONG or others as authorized by law.

Pursuant to section 154.183(c) of the Texas Family Code, the reasonable and necessary health-care expenses of the child that are not reimbursed by health insurance are allocated as follows: KELLY LONG is ORDERED to pay 50 percent and MICHAEL LONG is ORDERED to pay 50 percent of the unreimbursed health-care expenses if, at the time the expenses are incurred, KELLY LONG is providing health insurance as ordered.

The party who incurs a health-care expense on behalf of the child is ORDERED to furnish to the other party all forms, receipts, bills, statements, and explanations of benefits reflecting the uninsured portion of the health-care expenses within thirty days after he or she receives them. The nonincurring party is ORDERED to pay his or her percentage of the uninsured portion of the health-care expenses either by paying the health-care provider directly or by reimbursing the incurring party for any advance payment exceeding the incurring party's percentage of the uninsured portion of the health-care expenses within thirty days after the nonincurring party receives the forms, receipts, bills, statements, and explanations of benefits.

These provisions apply to all unreimbursed health-care expenses of the child who is the subject of this suit that are incurred while child support is payable for the child.

5. Secondary Coverage - IT IS ORDERED that if a party provides secondary health insurance coverage for the child, both parties shall cooperate fully with regard to the handling and filing of claims with the insurance carrier providing the coverage in order to maximize the benefits available to the child and to ensure that the party who pays for health-care expenses for the child is reimbursed for the payment from both carriers to the fullest extent possible.

6. Compliance with Insurance Company Requirements - Each party is ORDERED to conform to all requirements imposed by the terms and conditions of the policy of health insurance covering the child in order to assure the maximum reimbursement or direct payment by the insurance company of the incurred health-care expense, including but not limited to requirements for advance notice to any carrier, second opinions, and the like. Each party is ORDERED to use "preferred providers," or services within the health maintenance organization, if applicable. Disallowance of the bill by a health insurer shall not excuse the obligation of either party to make payment. Excepting emergency health-care expenses incurred on behalf of the child, if a party incurs health-care expenses for the child using "out-of-network" health-care providers or services, or fails to follow the health insurance company procedures or requirements, that party shall pay all such health-care expenses incurred absent (1) written agreement of the parties allocating such health-care expenses or (2) further order of the Court.

7. Claims - Except as provided in this paragraph, the party who is not carrying the health insurance policy covering the child is ORDERED to furnish to the party carrying the policy, within fifteen days of receiving them, any and all forms, receipts, bills, and statements reflecting the health-care expenses the party not carrying the policy incurs on behalf of the child. In accordance with section 1204.251 and 1504.055(a) of the Texas Insurance Code, IT IS ORDERED that the party who is not carrying the health insurance policy covering the child, at that party's option, may file any claims for health-care expenses directly with the insurance carrier with and from whom coverage is provided for the benefit of the child and receive payments directly from the insurance company. Further, for the sole purpose of section 1204.251 of the Texas Insurance Code, KELLY LONG is designated the managing conservator or possessory conservator of the child.

The party who is carrying the health insurance policy covering the child is ORDERED to submit all forms required by the insurance company for payment or reimbursement of health-

care expenses incurred by either party on behalf of the child to the insurance carrier within fifteen days of that party's receiving any form, receipt, bill, or statement reflecting the expenses.

8. Constructive Trust for Payments Received - IT IS ORDERED that any insurance payments received by a party from the health insurance carrier as reimbursement for health-care expenses incurred by or on behalf of the child shall belong to the party who paid those expenses. IT IS FURTHER ORDERED that the party receiving the insurance payments is designated a constructive trustee to receive any insurance checks or payments for health-care expenses paid by the other party, and the party carrying the policy shall endorse and forward the checks or payments, along with any explanation of benefits received, to the other party within three days of receiving them.

9. WARNING - A PARENT ORDERED TO PROVIDE HEALTH INSURANCE OR TO PAY THE OTHER PARENT ADDITIONAL CHILD SUPPORT FOR THE COST OF HEALTH INSURANCE WHO FAILS TO DO SO IS LIABLE FOR NECESSARY MEDICAL EXPENSES OF THE CHILD, WITHOUT REGARD TO WHETHER THE EXPENSES WOULD HAVE BEEN PAID IF HEALTH INSURANCE HAD BEEN PROVIDED, AND FOR THE COST OF HEALTH INSURANCE PREMIUMS OR CONTRIBUTIONS, IF ANY, PAID ON BEHALF OF THE CHILD.

Finding on Unpaid Medical Expenses

The parties agree and it is FOUND and CONFIRMED that MICHAEL LONG is in arrears for medical expenses in the amount of $434.20. IT IS ORDERED that MICHAEL LONG shall pay to KELLY LONG one hundred dollars ($100.00) beginning on August 1, 2017 and a like payment until said amount is paid in full.

Miscellaneous Child Support Provisions

Support as Obligation of Estate

IT IS ORDERED that the provisions for child support in this order shall be an obligation of the estate of MICHAEL LONG and shall not terminate on the death of MICHAEL LONG. Payments received for the benefit of the children, including payments from the Social Security Administration, Department of Veterans Affairs or other governmental agency or life insurance proceeds, annuity payments, trust distributions, or retirement survivor benefits, shall be a credit against this obligation. Any remaining balance of the child support is an obligation of MICHAEL LONG's estate.

Termination of Orders on Remarriage of Parties but Not on Death of Obligee

The provisions of this order relating to current child support terminate on the remarriage of MICHAEL LONG to KELLY LONG unless a nonparent or agency has been appointed conservator of the children under chapter 153 of the Texas Family Code. An obligation to pay child support under this order does not terminate on the death of MICHAEL LONG but continues as an obligation to S.L., J.L. and L.L.

Optimizing Development of Relationship between Parties and Children

IT IS ORDERED that MICHAEL LONG and KELLY LONG shall cooperate to secure counseling for the children at the discretion and expense of KELLY LONG. IT IS FURTHER ORDERED that MICHAEL LONG shall have the same right and access to the counselor and their records as KELLY LONG.

Coparenting Web Site Program

IT IS ORDERED that MICHAEL LONG and KELLY LONG each shall, within ten days after this order is signed by the Court, obtain at his or her sole expense a subscription to the AppClose program. IT IS FURTHER ORDERED that MICHAEL LONG and KELLY LONG each shall maintain that subscription in full force and effect for as long as any child is under the age of eighteen years and not otherwise emancipated.

IT IS ORDERED that MICHAEL LONG and KELLY LONG shall each communicate through the AppClose program with regard to all communication regarding the children, except in the case of an emergency or other urgent matter.

IT IS ORDERED that MICHAEL LONG and KELLY LONG each shall timely post all significant information concerning the health, education, and welfare of the children, including but not limited to the children's medical appointments, the children's schedules and activities, and request for reimbursement of uninsured health-care expenses, on the AppClose Internet Web site. However, IT IS ORDERED that neither party shall have any obligation to post on that Web site any information to which the other party already has access through other means, such as information available on the Web sites of the children's schools.

IT IS FURTHER ORDERED that MICHAEL LONG and KELLY LONG shall each timely post on the AppClose Internet Web site a copy of any e-mail received by the party from the children's schools or any health-care provider of the children, in the event that e-mail was not also forwarded by the schools or health-care provider to the other party.

For purposes of this section of this order, "timely" means on learning of the event or activity, or if not immediately feasible under the circumstances, not later than twenty-four hours after learning of the event or activity.

By agreement, the parties may communicate in any manner other than using the AppClose program, but other methods of communication used by the parties shall be in addition to, and not in lieu of, using the AppClose program.

Miscellaneous Provisions

1. Production of Documents-
    a. MICHAEL LONG shall provide to KELLY LONG copies of his 1040's filed with the IRS within 30 days of filing said documents. MICHAEL LONG and KELLY LONG agree to waive the requirement of three years or material and substantial change in circumstances to modify child support.
2. Prior Years Tax Returns-
    a. The parties agree that KELLY LONG has paid approximately $1,800.00 of joint tax liability for the 2010 and 2011 tax years and has not been repaid by MICHAEL LONG.
    b. KELLY LONG shall provide to MICHAEL LONG's attorney of record copies of the 2010 and 2011 tax returns and any deficiency notice from the IRS by August 11, 2017.
    c. MICHAEL LONG shall pay 50% of the amount paid by KELLY LONG to the IRS for tax years 2010 and 2011 within 120 days unless MICHAEL LONG is able to secure a refund from the IRS, in which case, the parties shall split the refund.

Injunctive Relief

The Court finds that, because of the conduct of MICHAEL LONG, a permanent injunction against him should be granted as appropriate relief because there is no adequate remedy at law.

The permanent injunction granted below shall be effective immediately and shall be binding on MICHAEL LONG; on his agents, servants, employees, and attorneys; and on those persons in active concert or participation with them who receive actual notice of this order by personal service or otherwise.

IT IS ORDERED that MICHAEL LONG is permanently enjoined from:

1. Publishing in any fashion or advising any person regarding sexual abuse allegations against KELLY LONG

Service of Writ

Petitioner and Respondent waive issuance and service of the writ of injunction, by stipulation or as evidenced by the signatures below. IT IS ORDERED that Petitioner and Respondent shall be deemed to be duly served with the writ of injunction.

Required Information

The information required for each party by section 105.006(a) of the Texas Family Code is as follows:

Name: MICHAEL LONG

Social Security number:	145
Driver's license number:	675 Issuing state: Texas
Current residence address:	3109 Douglas Fir Dr., New Braunfels, Texas 78130
Mailing address:	3109 Douglas Fir Dr., New Braunfels, Texas 78130
Home telephone number:	928-274-7867
Name of employer:	Self Employed
Address of employment:	N/A
Work telephone number:	N/A

Name: KELLY LONG

Social Security number:	991
Driver's license number:	Issuing state: Texas
Current residence address:	10412 Max Lane, Frisco, Texas 75035
Mailing address:	1042 Max Lane, Frisco, Texas 75035
Home telephone number:	210-518-9419
Name of employer:	
Address of employment:	
Work telephone number:	

Required Notices

EACH PERSON WHO IS A PARTY TO THIS ORDER IS ORDERED TO NOTIFY EACH OTHER PARTY, THE COURT, AND THE STATE CASE REGISTRY OF ANY CHANGE IN THE PARTY'S CURRENT RESIDENCE ADDRESS, MAILING ADDRESS, HOME TELEPHONE NUMBER, NAME OF EMPLOYER, ADDRESS OF EMPLOYMENT, DRIVER'S LICENSE NUMBER, AND WORK TELEPHONE NUMBER. THE PARTY IS ORDERED TO GIVE NOTICE OF AN INTENDED CHANGE IN ANY OF THE REQUIRED INFORMATION TO EACH OTHER PARTY, THE COURT, AND THE STATE CASE REGISTRY ON OR BEFORE THE 60TH DAY BEFORE THE INTENDED CHANGE. IF THE PARTY DOES NOT KNOW OR COULD NOT HAVE KNOWN OF THE CHANGE IN SUFFICIENT TIME TO PROVIDE 60-DAY NOTICE, THE PARTY IS ORDERED TO GIVE

NOTICE OF THE CHANGE ON OR BEFORE THE FIFTH DAY AFTER THE DATE THAT THE PARTY KNOWS OF THE CHANGE.

THE DUTY TO FURNISH THIS INFORMATION TO EACH OTHER PARTY, THE COURT, AND THE STATE CASE REGISTRY CONTINUES AS LONG AS ANY PERSON, BY VIRTUE OF THIS ORDER, IS UNDER AN OBLIGATION TO PAY CHILD SUPPORT OR ENTITLED TO POSSESSION OF OR ACCESS TO A CHILD.

FAILURE BY A PARTY TO OBEY THE ORDER OF THIS COURT TO PROVIDE EACH OTHER PARTY, THE COURT, AND THE STATE CASE REGISTRY WITH THE CHANGE IN THE REQUIRED INFORMATION MAY RESULT IN FURTHER LITIGATION TO ENFORCE THE ORDER, INCLUDING CONTEMPT OF COURT. A FINDING OF CONTEMPT MAY BE PUNISHED BY CONFINEMENT IN JAIL FOR UP TO SIX MONTHS, A FINE OF UP TO $500 FOR EACH VIOLATION, AND A MONEY JUDGMENT FOR PAYMENT OF ATTORNEY'S FEES AND COURT COSTS.

Notice shall be given to the other party by delivering a copy of the notice to the party by registered or certified mail, return receipt requested. Notice shall be given to the Court by delivering a copy of the notice either in person to the clerk of this Court or by registered or certified mail addressed to the clerk at 150 N. Seguin, New Braunfels, Texas 78130. Notice shall be given to the state case registry by mailing a copy of the notice to State Case Registry, Contract Services Section, MC046S, P.O. Box 12017, Austin, Texas 78711-2017.

NOTICE TO ANY PEACE OFFICER OF THE STATE OF TEXAS: YOU MAY USE REASONABLE EFFORTS TO ENFORCE THE TERMS OF CHILD CUSTODY SPECIFIED IN THIS ORDER. A PEACE OFFICER WHO RELIES ON THE TERMS OF A COURT ORDER AND THE OFFICER'S AGENCY ARE ENTITLED TO THE APPLICABLE IMMUNITY AGAINST ANY CLAIM, CIVIL OR OTHERWISE, REGARDING THE OFFICER'S GOOD FAITH ACTS PERFORMED IN THE SCOPE OF THE OFFICER'S DUTIES IN ENFORCING THE TERMS OF THE ORDER THAT RELATE TO CHILD CUSTODY. ANY PERSON WHO KNOWINGLY PRESENTS FOR ENFORCEMENT AN ORDER THAT IS INVALID OR NO LONGER IN EFFECT COMMITS AN OFFENSE THAT MAY BE PUNISHABLE BY CONFINEMENT IN JAIL FOR AS LONG AS TWO YEARS AND A FINE OF AS MUCH AS $10,000.

THE COURT MAY MODIFY THIS ORDER THAT PROVIDES FOR THE SUPPORT OF A CHILD, IF:

(1) THE CIRCUMSTANCES OF THE CHILD OR A PERSON AFFECTED BY THE ORDER HAVE MATERIALLY AND SUBSTANTIALLY CHANGED; OR

(2) IT HAS BEEN THREE YEARS SINCE THE ORDER WAS RENDERED OR LAST MODIFIED AND THE MONTHLY AMOUNT OF THE CHILD SUPPORT AWARD UNDER THE ORDER DIFFERS BY EITHER 20 PERCENT OR $100 FROM THE AMOUNT THAT WOULD BE AWARDED IN ACCORDANCE WITH THE CHILD SUPPORT GUIDELINES.

Warnings

WARNINGS TO PARTIES: FAILURE TO OBEY A COURT ORDER FOR CHILD

SUPPORT OR FOR POSSESSION OF OR ACCESS TO A CHILD MAY RESULT IN FURTHER LITIGATION TO ENFORCE THE ORDER, INCLUDING CONTEMPT OF COURT. A FINDING OF CONTEMPT MAY BE PUNISHED BY CONFINEMENT IN JAIL FOR UP TO SIX MONTHS, A FINE OF UP TO $500 FOR EACH VIOLATION, AND A MONEY JUDGMENT FOR PAYMENT OF ATTORNEY'S FEES AND COURT COSTS.

FAILURE OF A PARTY TO MAKE A CHILD SUPPORT PAYMENT TO THE PLACE AND IN THE MANNER REQUIRED BY A COURT ORDER MAY RESULT IN THE PARTY'S NOT RECEIVING CREDIT FOR MAKING THE PAYMENT.

FAILURE OF A PARTY TO PAY CHILD SUPPORT DOES NOT JUSTIFY DENYING THAT PARTY COURT-ORDERED POSSESSION OF OR ACCESS TO A CHILD. REFUSAL BY A PARTY TO ALLOW POSSESSION OF OR ACCESS TO A CHILD DOES NOT JUSTIFY FAILURE TO PAY COURT-ORDERED CHILD SUPPORT TO THAT PARTY.

Attorney's Fees

IT IS ORDERED that neither party is obligated to pay attorney fees to the other party at this time. IT IS FURTHER ORDERED that in the event of future litigation between the parties, either party may claim and be awarded, at the discretion of the court, attorney fees for litigation to date.

Costs

IT IS ORDERED that costs of court are to be borne by the party who incurred them.

Merger of Mediated Agreement

This order is stipulated to represent a merger of a mediated settlement agreement between the parties. To the extent there exist any differences between the mediated settlement agreement and this order, this order shall control in all instances.

Discharge from Discovery Retention Requirement

IT IS ORDERED that the parties and their respective attorneys are discharged from the requirement of keeping and storing the documents produced in this case in accordance with rule 191.4(d) of the Texas Rules of Civil Procedure.

Relief Not Granted

IT IS ORDERED that all relief requested in this case and not expressly granted is denied.

Date of Order

SIGNED on July 9, 2020

7/9/2020 4:03:48 PM

JUDGE PRESIDING

APPROVED AS TO FORM ONLY:

Chacon, Campbell & Alexander, PLLC
110 Broadway, Suite 380
San Antonio, TX 78205
(210) 560-2260

By: _____
Meredith Chacon
SBN 24034980
mchacon@ccatxlaw.com
Attorney for Michael Long

The Wright Reneau Law Firm, PLLC
391 Landa Street
New Braunfels, TX 78130
Tel: (830) 625-6933
Fax: (830) 626-5452

By: _____
Tracie Wright-Reneau
State Bar No. 24051966
tracie@wrightreneaulaw.com
Attorney for Petitioner

CASTEEL & CASTEEL
254 East Mill Street
New Braunfels, TX 78130
Tel: (830) 608-1611
Fax: (830) 608-0449

By: _____
Carter Casteel
State Bar No. 03981600
Carter@casteellaw.com
Attorney for Respondent

APPROVED AND CONSENTED TO AS TO BOTH FORM AND SUBSTANCE:

Respondent

Petitioner

JUDGE PRESIDING

APPROVED AS TO FORM ONLY:

The Wright Reneau Law Firm, PLLC
391 Landa Street
New Braunfels, TX 78130
Tel: (830) 625-6933
Fax: (830) 626-5452

By:
Tracie Wright-Reneau
State Bar No. 24051966
tracie@wrightreneaulaw.com
Attorney for Petitioner

CASTEEL & CASTEEL
254 East Mill Street
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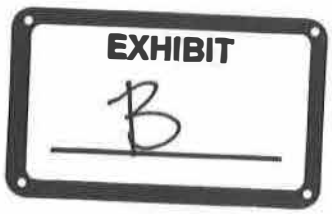
Tel: (830) 608-1611
Fax: (830) 608-0449

By:
Carter Casteel
State Bar No. 03981600
Carter@casteellaw.com
Attorney for Respondent

APPROVED AND CONSENTED TO AS TO BOTH FORM AND SUBSTANCE:

Respondent

Petitioner



NO. 417-53803-2020

EX PARTE	§	**IN THE DISTRICT COURT**
	§	
S.L, J.L. AND L.L.,	§	**417th JUDICIAL DISTRICT**
	§	
CHILDREN	§	**COLLIN COUNTY, TEXAS**

AFFIDAVIT OF KELLY LONG

Kelly Long appeared in person before me today and stated under oath:

"My name is Kelly Long. I am above the age of eighteen years, and I am fully competent to make this affidavit. The facts stated in this affidavit are within my personal knowledge and are true and correct.

My name is Kelly Long (hereinafter known as "Kelly") and I am the Mother to Sophie Long, born on September 16, 2010, Jack Long born on November 11, 2011 and Lucas Long born on December 19, 2013. Their Father is Michael Long (hereinafter known as "Michael").

My children went to stay with their Father in Seguin, Texas for his extended summer possession on June 15th at 6:00 p.m.. We exchanged as ordered in Waco, Texas. Since that time, I have had Facetime calls with my children on Monday's, Wednesday's, and Friday's, until this past weekend. Michael was ordered to return the kids to me in Waco, Texas on June 27th at 6:00 p.m.. He did not do so and has refused to communicate with me.

I have not heard from Michael since July 25th. I texted him multiple times yesterday regarding the exchange without response. Please see the text messages attached hereto as Exhibit I and incorporated for all intents and purposes. I arrived at the exchange place designated in our order at 5:56 p.m. and stayed until after 7:00 p.m. Michael never showed up with our children. Michael also failed to answer my scheduled Facetime call. Michael Long is withholding my children and refuses to return them to me."

STATE OF TEXAS §
§
COUNTY OF COLLIN §

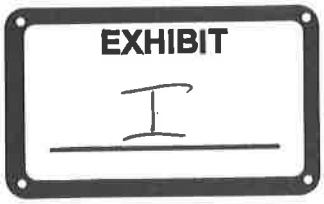
BEFORE ME, the undersigned authority, on this day personally appeared Kelly Long, known to me to be the person who's name is subscribed to the foregoing instrument and acknowledges to me that he executed the same for the purposes and consideration therein expressed.

SWORN AND SUBSCRIBED TO BEFORE ME on this the 28 day of July, 2020.

ADRIANA CANCINO
Notary Public, State of Texas
Comm. Expires 05-31-2022
Notary ID 129228325

Kelly Long

Notary Public, State of Texas
My Commission Expires: May 31, 2022



6:16

LTE

Michael Long
last seen Jul 27 at 5:16 PM

SAT, JUL 25

midnight, but I wanted to make sure that everything is okay.

12:01 AM

MON, JUL 27

We'll be arriving ETA 5:56 in Waco to pick the kids up per our court order, and letter your lawyer received on Friday.

3:22 PM

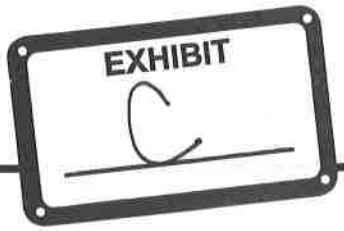
Hello - it's 6pm and you are not here. What is your ETA? Everything ok?

6:01 PM

Hi - it's now 6:15 and I haven't heard from you nor are you here with the kids as our order outlines. I'll be contacting the police department to file a report.

6:16 PM

Message Michael Long



Alexandra Willen

From: Alexandra Willen
Sent: Monday, July 27, 2020 10:37 AM
To: mchacon@ccatxlaw.com
Cc: Amber Shemesh; Adriana Cancino
Subject: RE: Long Matter

Ms. Chacon,

I am emailing to follow up on the letter sent on Friday. Please let us know if your client will be present at the exchange point at 6:00 pm as ordered.

Thank you,

Lexa Willen

Alexandra "Lexa" Willen
Associate Attorney

awillen@shemeshfamilylaw.com
Law Offices of Amber Shemesh, P.C.
12222 Merit Dr., Suite 1202
Dallas, TX 75251
214-432-2501 main
214-432-2510 facsimile

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From: Adriana Cancino <acancino@shemeshfamilylaw.com>
Sent: Friday, July 24, 2020 2:43 PM
To: mchacon@ccatxlaw.com
Cc: Amber Shemesh <amber@shemeshfamilylaw.com>; Alexandra Willen <awillen@shemeshfamilylaw.com>
Subject: Long Matter

Good afternoon Ms. Chacon,

Please see the attached correspondence.

Thank you,

Adriana Cancino

acancino@shemeshfamilylaw.com

Paralegal to Amber Shemesh
Link for Payment: https://secure.lawpay.com/pages/shemeshfamilylaw/trust

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Alexandra Willen

From: Alexandra Willen
Sent: Monday, July 27, 2020 3:39 PM
To: mchacon@ccatxlaw.com
Cc: Amber Shemesh; Adriana Cancino
Subject: Long: Today's Exchange

Ms. Chacon,

I have emailed and called your office in an attempt to speak regarding today's exchange. Ms. Long is headed to Waco to get the children as ordered at 6:00 p.m.. Please confirm that your client will be present at that time to surrender the children.

Should he not be present, we will be seeking Court intervention. Please call or email if you wish to discuss further.

Thank you,

Lexa Willen

Alexandra "Lexa" Willen
Associate Attorney

awillen@shemeshfamilylaw.com
Law Offices of Amber Shemesh, P.C.
12222 Merit Dr., Suite 1202
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Alexandra Willen

From: Alexandra Willen
Sent: Monday, July 27, 2020 7:43 PM
To: mchacon@ccatxlaw.com; Elizabeth Nielsen
Cc: Amber Shemesh; Adriana Cancino
Subject: Re: Long: Today's Exchange

Ms. Chacon, Ms. Nielsen,

Ms. Long is increasingly concerned about the welfare of the children. Michael did not show up to exchange, and he has not responded to any text messages from Ms. Long. He did not answer Ms. Long's mothers facetime yesterday, nor did he answered Ms. Long's scheduled facetime call today. I understand that this is unusual.

Ms. Long will be contacting Seguin police department, or Guadalupe County Sherriff's office to perform a welfare check at the residence, unless someone can confirm that he and the children are home and not in any danger. Please get back to me as soon as possible, so that appropriate steps can be taken this evening if need be.

Thank you,

Lexa Willen

Alexandra "Lexa" Willen
Associate Attorney

awillen@shemeshfamilylaw.com
Law Offices of Amber Shemesh, P.C.
12222 Merit Dr., Suite 1200
Dallas, TX 75251
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From: "mchacon@ccatxlaw.com" <mchacon@ccatxlaw.com>
Reply-To: "mchacon@ccatxlaw.com" <mchacon@ccatxlaw.com>
Date: Monday, July 27, 2020 at 4:54 PM
To: Alexandra Willen <awillen@shemeshfamilylaw.com>
Cc: Elizabeth Nielsen <enielsen@galyen.com>
Subject: Re: Long: Today's Exchange

Ms. Willen-
My client has retained Elizabeth Nielsen to represent him. I am copying her on this email. I have signed and sent her the motion and order of substitution and I believe she will be circulating it and filing it with the court.

Meredith Chacon,
Chacon, Campbell & Alexander, PLLC

110 Broadway, Suite 380

San Antonio, TX 78205

210-560-2260

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Sender Meredith Chacon, Chacon, Campbell & Alexander, PLLC, San Antonio, TX.

On Monday, July 27, 2020, 03:39:25 PM CDT, Alexandra Willen <awillen@shemeshfamilylaw.com> wrote:

Ms. Chacon,

I have emailed and called your office in an attempt to speak regarding today's exchange. Ms. Long is headed to Waco to get the children as ordered at 6:00 p.m.. Please confirm that your client will be present at that time to surrender the children.

Should he not be present, we will be seeking Court intervention. Please call or email if you wish to discuss further.

Thank you,

Lexa Willen

Alexandra "Lexa" Willen

Associate Attorney

awillen@shemeshfamilylaw.com

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12222 Merit Dr., Suite 1202

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Alexandra Willen

Subject: FW: Long: Today's Exchange

-----Original Message-----
From: Elizabeth Nielsen <enielsen@galyen.com>
Sent: Monday, July 27, 2020 7:52 PM
To: Alexandra Willen <awillen@shemeshfamilylaw.com>; mchacon@ccatxlaw.com
Cc: Amber Shemesh <amber@shemeshfamilylaw.com>; Adriana Cancino <acancino@shemeshfamilylaw.com>
Subject: Re: Long: Today's Exchange

Thank you for reaching out before assuming the worst. It is my understanding that the children are safe. I don't typically respond to email after business hours, but I wanted to save you and your client any unnecessary concern.

Please call my office tomorrow and I will be happy to discuss this case.

I look forward to working with you.

Enjoy your evening.

Best regards,

Elizabeth

Regards,

Elizabeth Nielsen
Bailey & Galyen
Family Law Attorney
Board Certified in Family Law
2216 S. Cooper Street
Arlington, Texas 76013

Toll Free (800) 529-8008
Main (817) 635-7013
Fax (817) 276-6013

enielsen@galyen.com

Please see our Web Sites for a listing
of all offices and locations
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Adriana Cancino on behalf of Amber Shemesh
Bar No. 24075066
acancino@shemeshfamilylaw.com
Envelope ID: 44878231
Status as of 07/28/2020 14:54:43 PM -05:00

Associated Case Party: Michael Long

Name	BarNumber	Email	TimestampSubmitted	Status
Meredith Mallonee Chacon	24034980	info@ccatxlaw.com	7/28/2020 10:32:57 AM	SENT

Associated Case Party: Kelly Long

Name	BarNumber	Email	TimestampSubmitted	Status
Amber Shemesh		amber@shemeshfamilylaw.com	7/28/2020 10:32:57 AM	SENT
Adriana Cancino		acancino@shemeshfamilylaw.com	7/28/2020 10:32:57 AM	SENT
Alexandra Willen		awillen@shemeshfamilylaw.com	7/28/2020 10:32:57 AM	SENT

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Elizabeth A.Nielsen		enielsen@galyen.com	7/28/2020 10:32:57 AM	SENT
Celia Morgan		cmorgan@galyen.com	7/28/2020 10:32:57 AM	SENT